



Oregon

John A. Kitzhaber, MD, Governor

December 14, 2012



Department of Transportation

ODOT Public Transit Division

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Ms Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E ST SW
Washington DC 20423

File Code:

233553

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Office of Proceedings

DEC 19 2012

RE: STB Docket No EP714, Information Required in Notice of Intent to Proceed
Interchange Commitments.

Dear Ms Brown:

The Oregon Department of Transportation (ODOT) has reviewed the documents associated with Surface Transportation Board actions under consideration in Ex Parte 714. Our department has serious concerns on a new requirement that an application for a line sale transaction include significantly more information than is currently required an interchange commitment provide

In Oregon, ODOT has a legacy of being directly involved in the creation of short line freight railroads from light density lines no longer wanted by the Class I carriers. This involvement includes outright ownership of 155 miles of corridor operated by short line companies. These efforts have successfully maintained access to the national rail freight network for areas of our state that otherwise would have become isolated.

Any efforts to increase reporting requirements on interchange agreements in the creation of new short lines could have a very negative impact on our future rail network in Oregon. Increased reporting requirements could be avoided by the large railroads simply by not selling or leasing future light density lines. Before the 1980's we saw this results of this approach. many light density rail freight lines were lost forever, leaving communities and rail customers without any rail service whatsoever.

We appreciate consideration of our concerns, and we respectfully request that the Board reconsider its handling of this issue.

Sincerely,

H A. (Hal) Gard, Administrator
ODOT Rail Division

